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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROSALIO ANDRES SIGUENZA-
ROMERO' aka "Tweety"

Defendant,

ZENITH FIREARMS, INC.,

Petitioner.

2:20-CR-156-RFB-DJA

**Stipulation Regarding ECF Docs. 404-
406**

The United States of America and counsel for Zenith Firearms, Inc. (ZFI), Aaron D. Lovaas, Esq., agree as follows:

1. On June 2, 2023, Zenith Firearms, Inc. (ZFI) filed a Petition for Ancillary Hearing, ECF No. 404, Declaration of Kutlay Kaya, ECF No. 405, and Certificate of Service, ECF No. 406.

2. The United States has not filed a response, but is now in contact with counsel for the Petitioner with the intent of negotiating a resolution without the need for the hearing.

3. Counsel for the Petitioner does not object to the United States filing a response at a later date, but counsel for the Petitioner and for the United States stipulate

1 that the Petition shall be held in abeyance while the Petitioner and the United States
2 negotiate in good faith.

3 4. If the negotiations do not result in a stipulated resolution, the United States
4 and counsel for the Petitioner will inform the Court, and the United States will then file a
5 response to the Petition.

6 Respectfully submitted this 16th day of October, 2023.

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8 NEWMAYER & DILLION LLP

JASON M. FRIERSON
United States Attorney

9 Aaron D. Lovaas
10 AARON D. LOVAAS, ESQ
11 *Counsel for Zenith Firearms, Inc. on behalf of*
12 *ZENITH FIREARMS, INC.*
13 *Petitioner*

Jacob H. Operskalski
JACOB H. OPERSKALSKI
Assistant United States Attorney

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15 ORDERED: Counsel to file resolution or Status Report within 60 days:
16 Dated this the 17th of October, 2023

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18 RICHARD F. BOULWARE, II
19 UNITED STATES DISTRICT JUDGE
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